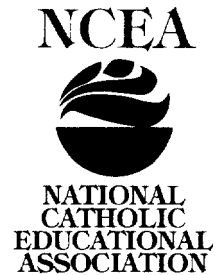


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October 7, 2000

Ms. Magalie Roman Salas

Re: Ultra-Wideband (ET Docket 98-153)

Secretary, FCC
455 12th St. SW
Washington, DC 20554

Dear Ms. Salas,

I am writing in response to the FCC's Notice of Proposed Rulemaking on ultra-wideband radio. I do so on behalf of the National Catholic Educational Association (NCEA), the largest private professional education association in the world. Founded in 1904, the association's membership includes more than 200,000 educators serving 7.6 million students at all levels from pre-K through graduate school.

NCEA has a strong interest in bringing internal networking into our more than 8,600 Catholic schools. We are particularly interested in the development of wireless products. We applaud recent actions by the FCC that will increase the availability and speed of some wireless networking products. At the same time, we believe UWB has tremendous potential for schools, allowing the fast and flexible networking of buildings at relatively low costs.

We urge the FCC to move forward to make the development of UWB wireless networking possible. UWB has the potential to provide low-cost, high-speed, unlicensed wireless devices for local area networking. Local area networking is a huge stumbling block for many schools that cannot afford the high costs and downtime associated with running cables throughout buildings. UWB wireless networking – which promises to be easier, less expensive, and faster to set up without sacrificing performance – therefore holds tremendous potential for schools, many of which have been unable to receive E-rate funds to help them afford internal connections. Since many schools are in older buildings where, even with the help of the E-rate, traditional wired networking has proven extremely difficult and expensive involving significant construction costs and often removal of asbestos and other unforeseen difficulties.

Ultra-wideband's local wireless networking potential is of particular interest to the schools networking community which has been working hard to bring new educational technologies to classrooms across the country. We understand that some applications of UWB technologies may pose minimal levels of interference with certain public safety signals, such as those used in GPS in airplanes. We urge the FCC to move forward judiciously in dealing with those applications.

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We are aware that the FCC has tentatively concluded that some devices which operate above 2 GHz – including UWB local area networking technologies – do not threaten to interfere with existing wireless technologies. For that reason, we strongly urge the Commission to move forward in licensing these products and making them widely available to schools/libraries throughout the country.

Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script, reading "Leonard F. DeFiore".

Leonard F. DeFiore, Ed.D
President